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4.4

Identification, Reporting, and Tracking of Noncompliances with Nuclear Safety Requirements

Recommended for approval by the ES&H Working Group

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New document or new requirements

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- ☐ New document
- ☒ Major requirement change
- ☐ Minor requirement change

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4.4

Identification, Reporting, and Tracking of Noncompliances with Nuclear Safety Requirements *

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Identification, Reporting, and Tracking of Noncompliances with Nuclear Safety Requirements

1.0 Introduction

1.1 Purpose and Scope

This document summarizes LLNL institutional requirements for identifying, reporting, and tracking noncompliances with DOE nuclear safety requirements. The requirements are promulgated in the DOE Nuclear Safety Rules, established in accordance with the Price-Anderson Amendments Act (PAAA). Implementation of the requirements is facilitated by the Laboratory Deputy Director for Operations (DDO) through the PAAA Project Office.

(An in-depth description of the PAAA regulatory process, including a discussion of the role, responsibilities, and activities of the PAAA Project Office, is presented in the PAAA Reporting Manual, which also includes a detailed description of the overall DOE nuclear safety enforcement program. For information about the PAAA Reporting Manual, contact the PAAA Project Office.)

The term "DOE Nuclear Safety Rules" refers to four parts of the U.S. Code of Federal Regulations (CFR) that are subject to enforcement by the DOE Office of Enforcement and Investigation (EH-Enforcement):

- 10 CFR 820, "Procedural Rules for DOE Nuclear Activities," particularly Section 820.11, "Information Requirements."
- 10 CFR 830, "Nuclear Safety Management."
- 10 CFR 835, "Occupational Radiation Protection."
- 10 CFR 708, "DOE Contractor Employee Protection Program."

EH-Enforcement serves as the regulatory authority for all contractor facilities and activities subject to DOE nuclear safety requirements. The DOE nuclear safety enforcement program relies on contractors to voluntarily identify and report noncompliances with DOE nuclear safety requirements, thereby allowing DOE to regulate its nuclear operations without the expense and intrusiveness of an inspection-based system, such as that used by the Nuclear Regulatory Commission to regulate commercial nuclear power plants.

Because the University of California and LLNL have committed to participate in the PAAA regulatory process, reporting by LLNL personnel and organizations of PAAA noncompliances is mandatory.

1.2 Applicability

This section defines the applicability of the requirements of this document.

1.2.1 Work Performed at the LLNL Livermore Site and Site 300

The requirements in this document apply to all LLNL personnel performing work at the LLNL Livermore site and Site 300 in any facility or activity that is subject to DOE nuclear safety requirements.

DOE nuclear safety requirements promulgated under the PAAA apply to all LLNL facilities, activities, and operations defined as "nuclear" under federal law. LLNL presently operates only nonreactor nuclear facilities, which 10 CFR 830 defines as:

"Those facilities, activities or operations that involve, or will involve, radioactive and/or fissionable materials in such form and quantity that a nuclear or a nuclear explosive hazard potentially exists to workers, the public, or the environment, but does not include accelerators and their operations and does not include activities involving only incidental use and generation of radioactive materials or radiation such as check and calibration sources, use of radioactive sources in research and experimental and analytical laboratory activities, electron microscopes, and x-ray machines."

LLNL categorizes nuclear facilities as Hazard Category 2, Hazard Category 3, or less than Category 3 (generally referred to as "radiological") in accordance with the guidance published in DOE-STD-1027-92 (see Section 4.3). Categorization of a facility as less than Category 3 includes a facility-specific review for applicability of 10 CFR 835 as defined in the LLNL Radiation Protection Program, which also serves as the LLNL implementation plan for the requirements of 10 CFR 835. [See Document 20.5, "Occupational Radiation Protection—Implementation of 10 CFR 835," in the *Environment, Safety, and Health (ES&H) Manual*.]

A nuclear facility subject to DOE nuclear safety requirements may comprise either of the following:

- A single, well-defined structure or a collection of well-defined structures.
- An aggregation consisting of one or more well-defined structures and areas that are not housed within those structures.

A nuclear activity subject to DOE nuclear safety requirements, such as transportation of nuclear materials, need not involve any well-defined structures or areas.

1.2.2 Work Performed at Other Locations

LLNL workers who perform DOE-authorized work at other DOE sites or nonDOE locations are also subject to requirements for identification, reporting, and tracking of PAAA noncompliances. Work performed by LLNL workers at DOE or nonDOE locations that do not have local requirements for identifying, reporting, and tracking PAAA noncompliances shall follow the requirements in this document or obtain approval for alternate requirements in accordance with Document 2.3, "LLNL Exemption Process," in the *ES&H Manual*. Incidents that are evaluated or reported into DOE or local tracking systems shall also be reported to the LLNL Livermore PAAA Project Office.

The degree of LLNL's responsibilities for DOE-authorized work performed by LLNL workers at other locations depend on whether:

- LLNL is directly managing the work.
- The work is being performed on a DOE site.
- The work is being performed in the United States.

Therefore, situations in which an LLNL organization is potentially responsible for compliance with DOE nuclear safety requirements include those in which LLNL personnel perform work at:

- Other DOE sites, in facilities or activities managed by LLNL.
- Other DOE sites, in facilities or activities managed by others, e.g., the Nevada Test Site, Pantex, and Oak Ridge.
- NonDOE locations in the United States, in facilities or activities managed by LLNL.
- NonDOE locations in the United States, in facilities or activities not managed by LLNL.
- NonDOE locations outside the United States, in facilities or activities managed by LLNL.
- NonDOE locations outside the United States, in facilities or activities not managed by LLNL.

Requirements for identifying, reporting, and tracking PAAA noncompliances associated with LLNL-managed work performed at the Nevada Test Site, as well as noncompliances associated with the situations listed above, are specified in Volume VI of the *ES&H Manual*.

In situations involving work performed offsite, requirements specific to the particular activity may need to be developed on a case-by-case basis. LLNL personnel contemplating such activities should contact the PAAA Project Office as early as possible to assure that compliance with DOE nuclear safety requirements is appropriately incorporated in the work planning process.

1.3 Incidents Typically Resulting in Potential PAAA Noncompliances

The LLNL Radiation Protection Program describes requirements that LLNL workers shall follow to be in compliance with 10 CFR 835. Typical incidents that could result in PAAA noncompliances for nuclear (including radiological) facilities and activities include, but are not necessarily limited to, the following:

- Any spill or other uncontrolled release of radioactive material that results in an Occurrence Report (see Section 2.4).
- Any event or condition resulting in an Unusual Occurrence Report in one of the subgroups listed in Table 1 (see Section 2.6).
- Any unplanned radiation exposure exceeding regulatory limits as specified in the LLNL Radiation Protection Program.
- Any loss of a sealed radioactive source designated by the LLNL Radiation Protection Program as accountable.

The LLNL Quality Assurance Plan and associated lower-tier implementing documents describe requirements that LLNL workers shall follow to comply with 10 CFR 830, Subpart A, "Quality Assurance Requirements." (For more information about the Quality Assurance Plan, see Document 41.1, "LLNL Quality Assurance Program," in the *ES&H Manual*.) Typical incidents that could result in PAAA noncompliances with quality assurance requirements for nuclear (including radiological) facilities and activities include, but are not necessarily limited to, the following:

- Any event or condition resulting in an Unusual Occurrence Report in one of the subgroups in Table 1.
- Failure to follow procedures in work control.
- Performing work without appropriate training or with expired training.
- Failure to adequately maintain authorization basis documents.

- Discovery of an actual inadequacy in the safety analysis of a facility or an activity.
- Exceedance of administrative limits placed on inventories of radiological or other hazardous materials.
- Failure to provide adequate technical or management review of technical basis documents supporting safety analyses.
- Deficiencies or defects discovered in items or services procured from subcontractors, equipment suppliers, or consultants.

Typical incidents resulting in PAAA noncompliances with quality assurance requirements specifically for Hazard Category 2 and 3 nuclear facilities and activities include, but are not necessarily limited to, the following:

- Any as-found positive unreviewed safety question (USQ) determination resulting from a backward-looking USQ evaluation. [A positive USQ determination resulting from a forward-looking USQ evaluation (e.g., for a planned activity) does not constitute a potential PAAA noncompliance.]
- Discovery of a potentially inadequate safety analysis (PISA) in a facility safety basis.

It is important for LLNL personnel to understand that to be a PAAA noncompliance, an event or condition need not necessarily:

- Result in actual harm, or increase the potential for harm, to LLNL workers or the general public.
- Result in actual degradation of the safety status of an LLNL facility that is subject to DOE nuclear safety requirements.
- Occur within the confines of an LLNL facility that is subject to DOE nuclear safety requirements.
- Involve radiological materials or radiation-generating devices.
- Involve intentional violation of safety requirements or other actions that could be considered as criminal behavior (e.g., falsification of records).

2.0 Processes

This section describes the processes for identifying, evaluating, and reporting noncompliances with DOE nuclear safety requirements.

2.1 General Approach

In identifying, evaluating, and reporting noncompliances with DOE nuclear safety requirements, LLNL takes a general approach consistent with the DOE philosophy and guidance described in the DOE Operational Procedures *Identifying, Reporting, and Tracking Nuclear Safety Noncompliances* (see Section 5.4). LLNL, through the PAAA Project Office:

- Routinely reviews incidents (i.e., events or conditions) and trends for potential noncompliance with DOE nuclear safety requirements.
- Determines whether an incident or trend is an actual PAAA noncompliance.
- Categorizes an incident or trend that is determined to be an actual noncompliance as either noncompliance tracking system (NTS)-reportable (i.e., significant) or site-reportable (i.e., minor).
- Prepares an NTS report, including all internal management and technical review and coordination required for an NTS-reportable noncompliance, then transmits the report to DOE.
- Periodically reviews all PAAA noncompliances for adverse trends.
- Develops timely corrective actions to correct PAAA noncompliances and prevent future recurrence.
- Reports to the DOE NTS all incidents that satisfy the "automatic reporting" criteria specified in the DOE Operational Procedures.
- Maintains formal records documenting the identification, reporting, and tracking of PAAA noncompliances. (Such records are subject to DOE audit.)

2.2 Self-Discovery of Noncompliances

DOE prefers that contractors identify nuclear safety problems before such problems lead to incidents with undesirable consequences. Therefore, DOE uses mitigation (i.e., reduction or elimination) of civil penalties to encourage contractor PAAA programs to focus on self-discovery, i.e., identifying problems in advance, rather than simply reacting to events. If identification of a noncompliance is the result of contractor initiative or a contractor's efforts to understand the broader implications of a particular nuclear safety problem, DOE generally grants mitigation for self-discovery, provided that the contractor has properly reported the noncompliance.

PAAA noncompliances discovered through internal LLNL sources usually qualify as "self-discovered" for reporting purposes. Self-discovery is important to the Laboratory, because if DOE issues a Notice of Violation for a self-discovered noncompliance, any resultant civil penalty may be mitigated. For a potential PAAA noncompliance to

qualify as self-discovered, it is not necessary that the PAAA Project Office directly identify the noncompliance. The act of any LLNL worker bringing a potential PAAA issue to the attention of the PAAA Project Office qualifies the potential PAAA noncompliance as "self-discovered." Consequently, it is vitally important that a worker promptly contact his or her immediate supervisor regarding any question or concern about a situation having possible PAAA implications.

When an event (e.g., catastrophic equipment failure) or condition exposes a nuclear safety problem that had escaped prior detection by the contractor, DOE considers the event or condition as "self-disclosed." In such cases, DOE generally considers the noncompliance itself as "self-discovered" by the contractor but likely would not consider mitigation, even if the contractor reports the noncompliance after the event or condition occurs.

2.3 Programmatic Noncompliances

A condition that indicates sufficient concern to warrant remedial action to correct a common underlying cause or weakness in controls should be evaluated as a programmatic noncompliance for reporting to the NTS. This section describes noncompliances that DOE considers to be potential programmatic noncompliances.

2.3.1 Repetitive Noncompliances

A repetitive noncompliance is one or more noncompliances that reasonably could have been prevented by corrective actions for a previous noncompliance. Repetitive noncompliances involve similar circumstances and root causes and occur within a "reasonable" period of time. Although DOE does not define how many noncompliances constitute "repetitive" noncompliances or what constitutes a "reasonable" time period, DOE generally links the severity of enforcement action to the following factors:

- The frequency with which the noncompliance occurred in a specific period of time.
- The number of times the noncompliance occurred.
- The similarity of noncompliances and their root causes.
- The elapsed time between similar noncompliances.
- The extent to which previous corrective actions for similar noncompliances were effective in preventing recurrence.

The relative weight that DOE gives to each of the factors depends on the circumstances of each case.

2.3.2 Programmatic Issues

A programmatic issue is said to exist when (1) several non-NTS-reportable noncompliances that are related but not necessarily identical have occurred, indicating a common breakdown in a program or program area, and (2) the similar noncompliances are caused by systematic problems having an underlying common cause involving some weakness in administrative or management controls or the implementation of such controls.

2.3.3 Willful Violations

A willful violation is an intentional action that a DOE contractor takes:

- With prior awareness that the action would violate a nuclear safety requirement, plan, or procedure.
- Without appropriate approvals.

DOE also considers gross negligence or deception (e.g., falsification or intentional destruction of records) to be a willful violation. DOE may, depending on the circumstances of an incident, refer the case to the U.S. Department of Justice for consideration of criminal sanctions. Willfulness does not include acts that reflect ordinary carelessness (e.g., inadvertent clerical errors).

2.4 Sources for Identifying PAAA Noncompliances

This section describes the sources for identifying PAAA noncompliances.

2.4.1 Internal Sources for Identifying PAAA Noncompliances

Internal sources include internal assessments and Occurrence Reports, described below.

Internal Assessments

Review for potential nuclear safety noncompliance issues is an integral part of LLNL nuclear (including radiological) facility operations. LLNL personnel responsible for the management of facilities or the conduct of activities that are subject to DOE nuclear safety requirements shall review the findings of various self-assessment activities for potential PAAA noncompliances. Self-assessment activities include, but are not necessarily limited to, internal audits, assessments, design reviews, surveillances, walkdowns, and inspections conducted in accordance with DOE Orders or requirements in Appendix G of Contract 48 with DOE.

The internal mechanisms for identifying PAAA noncompliances also include the more-formal institutional and directorate self-assessment programs, which generate

information (e.g., self-assessment reports) that can be used to identify potential noncompliances associated with nuclear (including radiological) facilities and activities. The programs also verify the implementation of appropriate corrective actions. Such formal assessments typically identify not only specific problems that may be noncompliances with DOE nuclear safety requirements, but also broader issues that may indicate programmatic weaknesses in how LLNL manages nuclear safety.

Occurrence Reports

Occurrence Reports associated with any nuclear facility or activity shall similarly be reviewed by the initiating directorate to determine whether the incident constitutes a potential noncompliance with a nuclear safety requirement or contributes to a set of incidents that together (i.e., as a collective aggregate or as a trend) constitute potential noncompliance. Such review is best performed when the occurrence report is being prepared for submittal to the Occurrence Reporting System (ORPS).

At the institutional level, the PAAA coordinator also independently reviews Occurrence Reports and Daily Operations Reports to identify potential PAAA noncompliances and notifies the responsible facility or program Associate Director of any noncompliances that are identified. Laboratory Nonconformance Reports (NCRs) also provide another routine internal source used to identify potential noncompliances. (Occurrence Reports are discussed in detail in Document 4.3, "Occurrence Reporting and Processing of Operations Information—LLNL Implementing Procedures for DOE Order 232.1A," in the *ES&H Manual*.)

2.4.2 External Sources for Identifying PAAA Noncompliances

External sources for identifying potential noncompliances include the following:

- Oversight audits (e.g., audits, assessments, surveillances, inspections, and visits) conducted by
 - DOE (including DOE Headquarters and field, site, and operations offices).
 - The Defense Nuclear Facilities Safety Board (DNFSB).
 - Other state and federal agencies, such as the Environmental Protection Agency, Department of Transportation, and the Occupational Safety and Health Administration.
- Evaluation by DOE of LLNL Occurrence Reports.
- Other sources (e.g., DOE facility representative inspections).

Potential noncompliances that an external agency explicitly identifies in such sources, or that LLNL identifies through evaluation of such external sources, do not qualify as "self-discovered" for reporting purposes. Regardless of how discovered, potential

PAAA noncompliances identified as the result of external reviews and audits shall be communicated to the affected Directorate(s) and to the PAAA Project Office by the LLNL point of contact (POC) for the audit.

All noncompliances discovered through external reviews and audits and communicated to the responsible directorate management are to be evaluated by the PAAA Project Office for reportability to the DOE NTS.

2.5 Incidents Requiring Prompt Notification of the PAAA Project Office

LLNL considers certain types of incidents as automatically warranting a formal PAAA noncompliance evaluation. Therefore, LLNL personnel responsible for the management of facilities or the conduct of activities that are subject to DOE nuclear safety requirements shall report such incidents to the PAAA Project Office upon discovery. Such incidents include the following:

- Any incident evaluated by the Criticality Safety Group above a Category 4 infraction, regardless of whether or not the incident actually increased the likelihood of a criticality event. Such incidents include, but are not necessarily limited to
 - Infractions of administrative limits on fissionable or fissile materials.
 - Failed surveillance of systems and components having a criticality safety function (e.g., criticality alarm systems).
 - Results of any formal assessment of criticality safety, either by internal or external reviewers.
- Any incident for which LLNL has submitted an Occurrence Report, if the incident involves the authorization basis of an LLNL facility subject to DOE nuclear safety requirements.
- Any potential PAAA noncompliance identified by formal assessment of LLNL activities subject to DOE nuclear safety requirements (e.g., the LLNL Radiation Protection Program), either by internal or external reviewers.
- Any incident that results in a formal LLNL incident analysis or a formal DOE accident investigation, if the incident involves a facility or activity subject to DOE nuclear safety requirements.
- Any incident that satisfies the criteria in the DOE Operational Procedures for automatic reporting to the DOE NTS.

2.6 Occurrences Automatically Reportable to the Noncompliance Tracking System

Under DOE Operational Procedures, certain incidents are automatically reportable to the NTS because of the nature and category of the associated Occurrence Report.

Table 1 lists the Unusual Occurrence Report subgroups that are automatically reportable (i.e., require automatic reporting) to the NTS. If an Occurrence Report does not fall into one of the subgroups shown or that is categorized below the "Unusual" level, the incident in question may still be NTS-reportable.

Table 1. Occurrences that are automatically NTS-reportable.

Nature of occurrence	Subgroup	Occurrence category
1. Facility condition	A. Nuclear Criticality Safety	Unusual
	B. Fires/Explosions	Unusual
	C. Safety Status Degradation	Unusual
	D. Loss of Control of Radioactive Material/Spread of Contamination	Unusual
	E. Safety Structure/System/Component Degradation	Unusual
	H. Operations	Unusual
2. Environmental	A. Radionuclide Releases	Unusual
	C. Hazardous Material Contamination	Unusual
3. Personnel radiological protection	A. Radiation Exposure	Unusual
	B. Personnel Contamination	Unusual

3.0 Responsibilities

General responsibilities for all workers are described in Document 2.1, "Laboratory and ES&H Policies, General Worker Responsibilities, and Integrated Safety Management," in the *ES&H Manual*. Specific responsibilities for key personnel are listed under each title in the following sections.

3.1 Workers

All LLNL personnel performing work in LLNL nuclear (including radiological) facilities, or otherwise involved in work that Laboratory management has determined is subject to DOE nuclear safety requirements, shall:

- Be aware that the DOE nuclear safety requirements apply to any work controlled by the LLNL Radiation Protection Program or the Laboratory Quality Assurance Plan.

- Notify their immediate supervisor of any event or condition that they believe might have PAAA implications.
- Cooperate as necessary with investigators from EH-Enforcement, including responding to information requests, assisting with site visits, and participating in interviews, if requested.
- Contact their immediate supervisor with any questions concerning DOE nuclear safety requirements and their enforcement.

3.2 Affected Managers

An affected manager is the person who is responsible for management of an LLNL facility or activity subject to DOE nuclear safety requirements. The PAAA Project Office considers the affected manager to be the facility or program AD having direct responsibility for the work area or work activity, respectively, in which a potential noncompliance is discovered. Responsibility may be delegated, e.g., to a facility manager or program manager.

An affected manager shall:

- Be aware of the DOE nuclear safety requirements and how the requirements apply to the facilities or activities for which he or she has management responsibility.
- Identify, and determine the reportability of, potential noncompliances with DOE nuclear safety requirements.
- Categorize, report, and correct incidents determined to be actual noncompliances with DOE nuclear safety requirements.
- Promptly report to the PAAA Project Office any events or conditions listed in Section 2.5 as automatically qualifying for formal evaluation as a potential PAAA noncompliance.
- Review Occurrence Reports for potential PAAA noncompliances. The PAAA Project Office shall be notified promptly of all occurrences that are categorized as "Unusual" and that satisfy the DOE criteria listed in Section 2.6 for automatic reporting to the DOE NTS.
- Review, for potential PAAA noncompliances, the results of
 - Internal oversight activities, including, but not necessarily limited to, audits, assessments, design reviews, surveillances, walkdowns, and inspections.

- External oversight activities, including, but not necessarily limited to, audits, assessments, surveillances, inspections, and visits conducted by DOE, the DNFSB, and other state or federal agencies.
- Review incidents to determine whether a potential PAAA noncompliance qualifies as a "repetitive noncompliance" or a "programmatic noncompliance," as described in Section 2.3.
- Notify the PAAA Project Office of any event or condition that he or she believes might have PAAA implications.
- Enter into DefTrack any event or condition determined by the PAAA Project Office to be a PAAA noncompliance, including associated corrective actions.
- Implement corrective actions for PAAA noncompliances and notify the PAAA Project Office upon the completion of those actions.
- Notify the PAAA Project Office when it is determined that formal PAAA corrective actions that will not be completed by the reported target completion date.
- Cooperate as necessary with investigators from EH-Enforcement, including responding to information requests, assisting with site visits, and participating in interviews, if requested.
- Contact the PAAA Project Office with any questions concerning DOE nuclear safety requirements and their enforcement.

3.3 PAAA Project Office and PAAA Coordinator

The DDO has designated the PAAA Project Office and the LLNL PAAA coordinator (i.e., the PAAA Project Office Manager) as the Laboratory POC for all matters related to the Price-Anderson Amendments Act or to compliance with the DOE nuclear safety requirements promulgated under the PAAA.

The PAAA coordinator shall:

- Notify affected management of potential PAAA noncompliances identified independently by the PAAA Project Office (e.g., by review of Occurrence Reports or assessment findings).
- Work with PAAA Project Office Staff to provide institutional support and make recommendations to affected management regarding identification, reporting, and tracking of PAAA noncompliances.

- Regularly review reported PAAA noncompliances to identify potential repetitive, programmatic, or systemic problems.
- Coordinate implementation of Nuclear Safety Rules issued by DOE.

4.0 Work Standards

4.1 Enabling Legislation

The following acts of Congress comprise the enabling legislation under which DOE has developed and issued the Nuclear Safety Rules:

- Atomic Energy Act of 1954 (as amended).
- Price-Anderson Amendments Act of 1988.

4.2 DOE Nuclear Safety Rules

The following parts (known as the DOE Nuclear Safety Rules) of the U.S. CFR set forth the DOE nuclear safety requirements, which govern the conduct of contractors performing DOE-authorized nuclear activities:

- 10 CFR 820, "Procedural Rules for DOE Nuclear Activities," particularly 820.11, "Information Requirements."
- 10 CFR 830, "Nuclear Safety Management."
- 10 CFR 835, "Occupational Radiation Protection."
- 10 CFR 708, "DOE Contractor Employee Protection Program."

In addition, the conduct of contractors performing DOE-authorized nuclear activities is also governed by the DOE Office of General Counsel's interpretations of the DOE Nuclear Safety Rules.

4.3 Work Smart Standards

DOE-STD-1027-92, (CH-1), "Hazard Categorization and Accident Analysis Techniques for Compliance with DOE O 5480.23," Sections 2–4 and Attachment 1 [except for the requirement for Certificates of Compliance for Type B containers], December 1997.

5.0 Resources for More Information

5.1 Contacts

The PAAA Project Office, located within the Laboratory Director's Office, serves as the Laboratory POC for all PAAA actions affecting LLNL facilities subject to DOE nuclear safety requirements. The PAAA Project Office serves as a facilitator and onsite consultant to LLNL nuclear (including radiological) facilities and coordinates the development and maintenance of implementation plans for PAAA Rules issued by the Department of Energy. The PAAA Project Office also conducts periodic orientation workshops on the DOE nuclear safety requirements affecting Laboratory operations and on the process for identifying, reporting, tracking, and correcting noncompliances with those requirements.

Laboratory personnel are encouraged to contact the PAAA Project Office at LLNL with any questions or concerns regarding compliance with DOE nuclear safety requirements.

5.2 LLNL Implementing Documents

The LLNL documents listed below implement the DOE nuclear safety requirements for programmatic and facility activities subject to those requirements. The documents rely on facility- or activity-specific procedures to implement the requirements in a manner appropriate for the facility or activity affected.

- LLNL Quality Assurance Program.
- LLNL Radiation Protection Program.

5.3 DOE Guidance

Additional guidance concerning applicability of DOE nuclear safety requirements and the identification, reporting, tracking, and correction of noncompliances with those requirements is provided in:

- 10 CFR 820, Appendix A, "General Statement of Enforcement Policy."
- DOE Operational Procedures (see Section 5.4).
- DOE Enforcement Procedures (see Section 5.4).
- DOE-HDBK-1985, "DOE Enforcement Program Roles and Responsibilities" (see Section 5.4).
- Enforcement Guidance Supplements (EH-Enforcement).
- Enforcement Actions (EH-Enforcement).

5.4 Other Sources

DOE-HDBK-1085-95, "DOE Handbook—DOE Enforcement Program Roles and Responsibilities," U.S. Department of Energy (August 1995).

DOE M 232.1-1A, "Occurrence Reporting and Processing of Operations Information," U.S. Department of Energy.

"Operational Procedures—Identifying, Reporting, and Tracking Nuclear Safety Noncompliances Under Price-Anderson Amendments Act of 1988," U.S. Department of Energy, Office of Enforcement and Investigation (June 1998).

"Operational Procedures for Enforcement—Enforcement of DOE Nuclear Safety Requirements Under Price-Anderson Amendments Act of 1988," U.S. Department of Energy, Office of Enforcement and Investigation (June 1998).